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Attorneys for NEW YORK ROWING ASSOCIATION, INC. and
PETER J. SHARP BOATHOUSE, INC.
150 East 42nd Street
New York, New York 10017-5639
(212) 490-3000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of the Complaint of Andrew Harnett, as
owner of vessel M/V READY JET GO for Exoneration
from or Limitation of Liability.

and

In the Matter of Peter J. Sharp Boathouse, Inc., as owner of
the floating vessel constituting the boathouse, seeking
exoneration from or limitation of liability.

**1:06-cv-00699(LMM)(GWG)
consolidated with:
1:06-cv-03061(LMM)(GWG), and
1:06-cv-03062(LMM)(GWG)**

and

In the Matter of New York Rowing Association, Inc., as
owner of a 2001, coxless Empacher rowing shell, seeking
exoneration from or limitation of liability.

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**NOTICE OF MOTION FOR SUMMARY JUDGMENT
ON BEHALF OF
NEW YORK ROWING ASSOCIATION, INC. and
PETER J. SHARP BOATHOUSE, INC.**

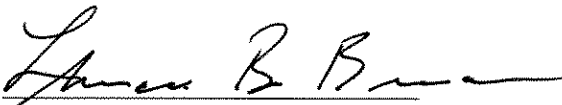
PLEASE TAKE NOTICE that pursuant to Rule 56 of the Federal Rules of Civil
Procedure and upon the annexed Memorandum of Law, the Local Rule 56.1(a) Statement
of Undisputed Material Facts, the Affidavit of Lawrence B. Brennan, annexed exhibits,
and upon the pleadings filed with the Court in these consolidated proceedings, the New

York Rowing Association, Inc. and Peter J. Sharp Boathouse, Inc. will move this Court, before the Honorable Lawrence M. McKenna, of the United States District Court for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an Order granting summary judgment against claimants Nina Runsdorf and Lee Runsdorf, as Co-Executors of the Estate of Jim Runsdorf, and Nina Runsdorf individually and as legal guardian of the minor children Alexa J. Runsdorf and Katherin Teddy Runsdorf, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
April 11, 2012

Respectfully Submitted,

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

By: 
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CERTIFICATE OF SERVICE

I, Brooke Travis, hereby certify that I electronically filed the attached Notice of Motion for Summary Judgment on behalf of Peter Jay Sharp Boathouse, Inc. and New York Rowing Association, Inc., with the Clerk of the Court using the CM/ECF system which will send notification of such filing electronically to the following:

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/s/ Brooke Travis